

Todd M. Friedman (SBN 216752)  
tfriedman@toddfllaw.com  
Adrian R. Bacon (SBN 280332)  
abacon@toddfllaw.com  
Law Offices of Todd M Friedman, P.C.  
21031 Ventura Blvd, Suite 340  
Woodland Hills, CA 91364  
Telephone: (323) 306-4234  
Facsimile: (866) 633-0228

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVE VACCARO, individually, and  
on behalf of other members of the  
general public similarly situated,

Plaintiff,

vs.

ALTAIS, INC.; BROWN & TOLAND  
PHYSICIAN SERVICES  
ORGANIZATION, LLC, GRAIN  
CONSULTING, CORP, and DOES  
through 10, inclusive, and each of them

Defendants.

) Case No.

) 2:23-CV-04513-KK-BFM

) **JOINT STIPULATION OF**

) **DISMISSAL OF ACTION OF THE**

) **INDIVIDUAL CLAIMS**

) **WITH PREJUDICE AND THE**

) **PUTATIVE CLASS CLAIMS**

) **WITHOUT PREJUDICE**

NOW COME THE PARTIES by and through their attorneys to respectfully move  
this Honorable Court to dismiss this matter with prejudice as to Plaintiff's  
individual claims and without prejudice as to the putative Class pursuant to  
Federal Rules of Civil Procedure 41(a)(1)(A)(ii). Defendant Grain Consulting  
Corp.'s third-party complaint against Nextiva shall be dismissed without  
prejudice. Each party shall bear their own costs and attorney fees.

///

Respectfully submitted this 17th Day of January, 2024,

**Law Offices of Todd M. Friedman P.C**

By: s/Adrian R. Bacon  
ADRIAN R. BACON Esq  
Attorney for Plaintiff

**Caldarelli Hejmanowski Page & Leer LLP**

By: /s/ Lee E. Hejmanowski  
Lee E. Hejmanowski  
Attorney for Defendant

**Signature Certification**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant and that I have obtained their authorization to affix their electronic signature to this document.

Dated: January 17, 2024 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

By: s/ Adrian R. Bacon  
Adrian R. Bacon ESQ.  
Attorney for Plaintiff

1 Filed electronically on this 17th Day of January, 2024, with:

2  
3 Notification sent electronically via the Court's ECF system to:

4 Honorable Judge of the Court  
5 United States District Court

6 All Counsel of Record as Recorded On The Electronic Service List.  
7

8 This 17th Day of January, 2024.

9 s/Adrian R. Bacon

10 ADRIAN R. BACON  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28